

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

MARGUERITE CARRUBBA,  
Plaintiff,

VERSUS CIVIL ACTION NO: 1:07cv1238

HARRISON COUNTY, MISSISSIPPI,  
by and through its Board of  
Supervisors; HARRISON COUNTY  
SHERIFF, George Payne;  
WAYNE PAYNE; DIANE GATSON RILEY;  
STEVE CAMPBELL; RICK GATSON;  
RYAN TEEL; KARLE STOLZE;  
WILLIAMS PRIEST; JAMES A.  
GONDLES, JR; AMERICAN  
CORRECTIONAL ASSOCIATION;  
JOHN AND JANE DOES 1-3; HEALTH  
ASSURANCE, LLC AND J.L. WHITE,  
Defendants.

DEPOSITION OF KARL STOLZE

Taken at the offices of Dukes, Dukes,  
Keating & Faneca, 2909 13th Street,  
Sixth Floor, Gulfport, Mississippi, on  
Tuesday, September 22, 2009, beginning  
at 8:36 a.m.

REPORTED BY:

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1 Cell Number 7 at 11:02:53-ish, did you see  
2 Marguerite being a problem at any time on this  
3 booking video?

4 A. No.

5 Q. All right. We'll go through it frame by  
6 frame. And it's hard to tell what's going on in  
7 there, isn't it?

8 A. Yes.

9 Q. I mean, it's not the best quality film.  
10 And at 11:03:26, that's Marguerite sitting on the  
11 floor, isn't it?

12 A. Yes.

13 Q. And at 11:03:28, is that you coming out  
14 or Priest?

15 A. Bump it forward a little bit. It looks  
16 like me, yes.

17 Q. All right. And when you leave at  
18 11:03:32, Marguerite is cuffed and on the floor,  
19 shackled and on the floor; isn't that right?

20 A. Yes.

21 Q. All right. Tell us what happened that  
22 caused you have to go back into Holding Cell  
23 Number 7, take Marguerite, spend some time with  
24 her, and then when you walk out, she's shackled on  
25 the floor.